

1 IN THE UNITED STATES DISTRICT COURT
2 WESTERN DISTRICT OF VIRGINIA
3 ROANOKE DIVISION
4
5

6 - - - - -
7 BRIAN SCOTT DUNN,)
8 Plaintiff)
9 -vs-)
10 SHERIFF MORGAN MILLIRONS,)
11 Defendant)
12 - - - - -
13
14

CASE NO.:
7:14cv00429

15 DEPOSITION OF: CHRISTINE LINK-OWENS
16

17 DATE: APRIL 10, 2015 (Friday)

18 TIME: 11:15 a.m.

19 LOCATION: Giles County Administration Building
20 315 North Main Street
21 Pearisburg, Virginia 24134

22 REPORTER: Lisa M. Hooker, RPR
23 Registered Professional Reporter #29505
24

BRIAN SCOTT DUNN -vs- SHERIFF MORGAN MILLIRONS
Christine Link-Owens on 04/10/2015

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			Page 2				Page 4	
1	I N D E X				1	CHRISTINE M. LINK-OWENS		
2					2	having been sworn by the Registered Professional Reporter,		
3	EXAMINATION BY:			PAGE	3	Lisa M. Hooker, to tell the truth, the whole truth, and		
4	Thomas E. Strelka, Esq.			4	4	nothing but the truth, testified as follows:		
5	Jim H. Guynn, Jr., Esq.			65	5			
6					6	EXAMINATION BY THOMAS E. STRELKA, ESQ.		
7	Appearance Page			3	7	Q. Good morning, ma'am.		
8	Exhibit Page			3	8	A. Good morning.		
9	Witness Signature Page			---	9	Q. As I indicated to you earlier, I'm Tommy		
10	Witness Signature Waiver			82	10	Strelka and I represent Mr. Dunn, and here you are in a		
11	Reporter's Certificate			83	11	deposition. Have you ever been deposed before?		
12	Errata Sheet			---	12	A. No.		
13					13	Q. Okay, and it's really easy. You don't win		
14					14	it, you don't lose it; you just get through it and go		
15					15	home, okay?		
16					16	A. All right.		
17					17	Q. Okay, and I'm going to ask you questions		
18					18	and you just provide truthful answers; that is all that		
19					19	you have to do.		
20					20	A. All right.		
21					21	Q. Two little ground rules. Our lovely court		
22					22	reporter can only type up what one person is saying at a		
23					23	time, so please wait to respond until I'm completely done		
24					24	speaking.		

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1	A P P E A R A N C E S				1	A. Okay.		
2	FOR THE PLAINTIFF:	STRELKA LAW OFFICE, PC			2	Q. And the other thing is, if I ask you a yes		
3		Attorneys at Law			3	or no question, I would ask that you verbally respond with		
4		119 Norfolk Avenue, SW			4	a yes or no and try to stay away from the dreaded huh-huh		
5		Suite 330			5	and the hmm-hmm's, okay?		
6		Roanoke, Virginia 24011			6	A. Okay.		
7		(540) 283-0802			7	Q. And state your full legal name, please.		
8		(no fax available)			8	A. Christine Marie Link-Owens.		
9	FOR THE DEFENDANT:	GUYNN and WADDELL, PC			9	Q. All right, Ms. Link-Owens, and where are		
10		Attorneys at Law			10	you currently employed?		
11		415 South College Avenue			11	A. At Virginia Tech, Transportation		
12		Salem, Virginia 24153			12	Institute.		
13		(540) 387-2320			13	Q. Okay, and you are also affiliated with an		
14		(540) 389-2350			14	organization previously known as the Giles County Animal		
15		jim.guynn@gmdlawfirm.com			15	Rescue; is that right?		
16		BY: JIM H. GUYNN, JR., ESQ.			16	A. Yes.		
17	ALSO PRESENT:	Brian Scott Dunn			17	Q. And now it's known as the Giles Animal		
18		Morgan Millirons			18	Rescue?		
19					19	A. Yes.		
20					20	Q. And what services does that organization		
21					21	provide?		
22					22	A. It was founded in 1999 to primarily address		
23					23	shelter issues, to help a County become compliant with		
24					24	shelter regulations, and to raise awareness in the		

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E X H I B I T S			
NUMBER	DESCRIPTION	PAGE	
Exhibit 42	Letter dated 2-6-11.	16	
Exhibit 43	Email Chain.	31	
Exhibit 44	Email Chain.	34	
Exhibit 45	Email from Link to Helsel.	46	
Exhibit 46	Email from Link to Helsel.	49	
Exhibit 47	Email from Link to Helsel.	51	
Exhibit 48	Email from Link to McKlarney.	54	
Exhibit 49	Copies of Photographs.	59	
Exhibit 50	Email from Link to Helsel.	63	

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<p>1 community about overpopulation, that there is a shelter 2 and pets need to be adopted, encouraging adoption, 3 encouraging spay and neuter, and animal welfare issues 4 within the County, and -- but primarily, it was actually 5 starting to help improve shelter conditions and adoption 6 rates.</p> <p>7 Q. Okay.</p> <p>8 A. At that time, in 1999, and we still are 9 doing the same work.</p> <p>10 Q. Okay.</p> <p>11 A. And we are incorporated.</p> <p>12 Q. And you are the president of this 13 organization?</p> <p>14 A. I was for the past four years. I have 15 stepped back as of January 1 of 2015, and I am now still 16 very active in the volunteerism and rescue coordinator 17 still.</p> <p>18 Q. You were the president in 2013; is that 19 right?</p> <p>20 A. Yes.</p> <p>21 Q. Okay, and did -- did -- in 2013, did your 22 organization facilitate volunteers working at the shelter 23 in Giles?</p> <p>24 A. Yes.</p>	<p>1 were prevented access to the shelter in 2013?</p> <p>2 A. Correct.</p> <p>3 Q. Okay, prior to that happening, can you give 4 me a sense of how often volunteers would be at the 5 shelter?</p> <p>6 A. Any time that we could find volunteers 7 willing to go, we were given basically free reign that we 8 could go any time, day or night. We could go and get a 9 key. Some volunteers had keys of their own, and then some 10 volunteers were asked to go and to check out a key from 11 the sheriff's department at the dispatch office.</p> <p>12 Q. Okay.</p> <p>13 A. And I believe that it was in 2012, we had 14 so many volunteers and we had run into some issues where 15 sometimes the key would not be available when we would go 16 to dispatch; for instance, one time they had loaned that 17 particular key to a person who was supposed -- it was not 18 one of our volunteers, not a volunteer situation; it was 19 someone that needed to do repairs to the shelter, and I 20 can't remember the exact situation, but the key was not 21 available when we went to get a key and we really needed 22 to get to a shelter to pull an animal to get it to a vet, 23 so after that incident, we asked the animal control 24 officer if we could use a real estate lock box and hang on</p>
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<p>1 Q. Okay.</p> <p>2 A. Since 1999, when we first started this 3 organization, the County has allowed volunteers to come to 4 the shelter to help keep the shelter open hours for the 5 public.</p> <p>6 Q. Okay.</p> <p>7 A. Because before that, there really was not 8 set open hours; therefore, the -- therefore, it is very 9 unlikely that adoptions can occur if the public cannot 10 come out there, so yes, one of our primary duties was to 11 hold open hours so that the public could come and 12 hopefully adopt or reclaim animals. When we -- the more 13 involved we became, the higher reclaims; the reclaim rate 14 actually also went up when people were able to come up and 15 say, oh, yes, my pet is here and we were able to reclaim 16 them, and then we also do what we can to pull animals and 17 send them to rescues and other facilities where there is a 18 no kill situation to avoid euthanasia, because at the 19 pound, of course, they can only keep the pets for a 20 certain period of time and then they have to make a 21 decision to euthanize if no one comes to adopt or claim 22 them, so we are very active and were, actually, until 23 2013.</p> <p>24 Q. Okay. And at some point, the volunteers</p>	<p>1 the gate, and only certain volunteers, not even all 2 volunteers but certain volunteers would use this code and 3 open up the lock box and get the key, so therefore we 4 could bypass having to go and check out a key and the 5 people would not need to have a personal copy of the key, 6 that we could just use one shared key, and the only person 7 that would need it at the time would be the one at the 8 shelter and then they would put it back in the lock box 9 when they left, and that was actually very helpful. The 10 volunteers actually volunteered more once we started that, 11 having that process, because it made their time, which was 12 so valuable already and they only had an hour window, and 13 it saved -- may save the volunteer that extra 30 minutes 14 of having to drive all the way from dispatch to the 15 shelter which was already a long drive for people anyway, 16 so that was a great system; it was great that the animal 17 control officer allowed us to do that, but however the 18 complaints arose that volunteers were there too much, I'm 19 not sure how that could be a problem.</p> <p>20 Q. Let me pause you there, if that is okay.</p> <p>21 A. Okay.</p> <p>22 Q. Thank you; you are doing great, but how are 23 you aware of any complaints about volunteers being there 24 too much?</p>

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<p>1 A. Well, we asked the Sheriff for a meeting so</p> <p>2 we could discuss some problems that we had found at the</p> <p>3 shelter.</p> <p>4 Q. Okay. Do you recall -- do you recall what</p> <p>5 time frame we are talking about right now?</p> <p>6 A. In the spring.</p> <p>7 Q. Okay of 2013?</p> <p>8 A. Yes.</p> <p>9 Q. Okay.</p> <p>10 A. Probably, I mean, we started requesting</p> <p>11 meetings in February.</p> <p>12 Q. Okay.</p> <p>13 A. Of that year.</p> <p>14 Q. And how would you request a meeting with</p> <p>15 the Sheriff?</p> <p>16 A. Actually, technically in February of 2011,</p> <p>17 I hand delivered a letter to the Sheriff outlining</p> <p>18 problems.</p> <p>19 Q. Okay.</p> <p>20 A. And so those same problems that we brought</p> <p>21 up multiple times, beginning in 2011 through 2013.</p> <p>22 Q. Okay, and after you hand delivered this</p> <p>23 letter in February of 2011 to the Sheriff, did he ever</p> <p>24 respond to the letter?</p>	<p>1 Q. Okay.</p> <p>2 A. But this is when I became president, so</p> <p>3 this is what I --</p> <p>4 MR. STRELKA: I don't know if I have a copy</p> <p>5 of this, because this is earlier than the other</p> <p>6 things that we -- do you mind if we enter this as</p> <p>7 an Exhibit?</p> <p>8 MR. GUYNN: Well, I think that we ought to</p> <p>9 make copies of it.</p> <p>10 THE WITNESS: You can have that one.</p> <p>11 MR. STRELKA: We'll make copies of</p> <p>12 everything before we go.</p> <p>13 MR. GUYNN: Well, we will need one for all</p> <p>14 of us during the deposition.</p> <p>15 MR. STRELKA: Sure, go and get some copies</p> <p>16 of that.</p> <p>17 BY MR. STRELKA:</p> <p>18 Q. While he is getting copies, I will go to a</p> <p>19 different area of questioning real quick if that is all</p> <p>20 right. Prior to there being limited access to volunteers</p> <p>21 at the shelter, I think that you've outlined how you would</p> <p>22 go and get the key and get access to the shelter, where</p> <p>23 was the food stored at the shelter to feed the animals?</p> <p>24 A. There is one room in the shelter where food</p>
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<p>1 A. No.</p> <p>2 Q. Did you ever have a meeting with him?</p> <p>3 A. No.</p> <p>4 Q. He never called you?</p> <p>5 A. No.</p> <p>6 Q. Okay. And any -- and I think that you said</p> <p>7 again in, what was it, January of 2013, or when was your</p> <p>8 next --</p> <p>9 A. At least February of 2013, we started -- I</p> <p>10 mean, we were continually trying to keep bringing those</p> <p>11 same problems that were in the initial letter in 2011. We</p> <p>12 continued periodically trying to get those problems</p> <p>13 addressed.</p> <p>14 Q. Okay. And sitting here today, without the</p> <p>15 letter here in front of you, and I have some documentation</p> <p>16 that we can go through in a minute, what were some of the</p> <p>17 issues that you remember?</p> <p>18 A. Do you want to see a copy of it?</p> <p>19 Q. Yes, sure, bring it out. I probably have</p> <p>20 it.</p> <p>21 A. So this is a copy of the letter, the first,</p> <p>22 and even prior to this document, the president before me</p> <p>23 had brought many of the issues to the Sheriff even before</p> <p>24 me.</p>	<p>1 was stored. Well, actually, there were -- one room where</p> <p>2 primarily most of the food was stored but for cats;</p> <p>3 sometimes they would have food in another room for cats,</p> <p>4 and that room was rarely locked.</p> <p>5 Q. Okay.</p> <p>6 A. I don't know all of the details, other than</p> <p>7 people kept -- volunteers kept coming to know and saying</p> <p>8 when we went to the shelter, the food room was locked, and</p> <p>9 so that -- I mean, as far as the time frame, that was in</p> <p>10 2012 that this began, and often times, our volunteers were</p> <p>11 the only people there for the day, so we would feed the</p> <p>12 animals if we knew that we needed to, because staff had</p> <p>13 the day off, and -- or if we had -- it was commonplace</p> <p>14 that animals would be surrendered while we were there, and</p> <p>15 sometimes those animals looked starved and we would want</p> <p>16 to give them a bowl of food, so that did become an issue</p> <p>17 when the food was staying locked. We were told -- so when</p> <p>18 we asked, why is the food room locked, he said it was</p> <p>19 because food was disappearing.</p> <p>20 Q. And who told you that?</p> <p>21 A. The animal control officer told volunteers</p> <p>22 who asked.</p> <p>23 Q. Okay. And did you ask personally?</p> <p>24 A. I'm not sure if I ever asked the question,</p>

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<p>1 but at one of the meetings with the Sheriff, he stated</p> <p>2 that to me.</p> <p>3 Q. Okay, and the shelter staff, that would</p> <p>4 have been Ms. Chastity Perkins; is that right?</p> <p>5 A. Yes, and Melvin Dalton.</p> <p>6 Q. Dalton?</p> <p>7 A. The animal control officer.</p> <p>8 Q. Okay, and just before this deposition, Ms.</p> <p>9 Perkins, although she's been married, her last name is now</p> <p>10 Jones, testified that she was at the shelter every day</p> <p>11 during the week with the exception of holidays; would you</p> <p>12 agree or disagree with that?</p> <p>13 MR. GUYNN: I'm going to object to the</p> <p>14 characterization.</p> <p>15 MR. STRELKA: Do you mind telling me --</p> <p>16 MR. GUYNN: She said that she was there</p> <p>17 holidays, too.</p> <p>18 MR. STRELKA: Okay.</p> <p>19 MR. GUYNN: She said the shelter wasn't</p> <p>20 open, but she was there.</p> <p>21 MR. STRELKA: But she was there, all</p> <p>22 right.</p> <p>23 BY MR. STRELKA:</p> <p>24 Q. Mr. Guynn may have clarified my point. Ms.</p>	<p>1 years working in that type of environment, never seen a</p> <p>2 dog so thirty when you arrive, even if they turned over</p> <p>3 their water bowl since you were there the day before, they</p> <p>4 would not be attacking the water when you filled it up.</p> <p>5 Q. Okay. And did you ever address any of</p> <p>6 those issues that you just described with Ms. Perkins?</p> <p>7 A. No.</p> <p>8 Q. All right.</p> <p>9 A. I didn't feel that it was my place.</p> <p>10 Q. Okay. What about Mr. Dalton?</p> <p>11 A. No.</p> <p>12 Q. Okay. But I believe that we're going to</p> <p>13 get into it; you attempted to address some of these issues</p> <p>14 with the Sheriff?</p> <p>15 A. Yes.</p> <p>16 MR. STRELKA: All right. Well, I'd like to</p> <p>17 enter this as an Exhibit, the letter.</p> <p>18</p> <p>19 (The above-mentioned document was marked as</p> <p>20 Deposition Exhibit Number 42 and entered into the</p> <p>21 Deposition.)</p> <p>22</p> <p>23 BY MR. STRELKA:</p> <p>24 Q. I'd like you to take a look at Exhibit</p>
Page 15	Page 17
<p>1 Jones testified that she was there every day of the week;</p> <p>2 would you agree or disagree with that?</p> <p>3 A. I find it hard to believe, because when</p> <p>4 volunteers would go to the shelter, there would be so much</p> <p>5 feces in their run; I mean, I have worked in facilities</p> <p>6 for 20 years, and I've cleaned a lot of kennels in my 20</p> <p>7 years of taking care of pets that are boarded in a kennel</p> <p>8 situation, and I know how much 24 hours worth of food,</p> <p>9 what it looks like, so when I go there and I see that</p> <p>10 there is so much feces and urine that the dog is covered</p> <p>11 from head to toe because the only place to lay down is in</p> <p>12 the piles and piles and piles of feces, and they have no</p> <p>13 water, they are so thirsty, that as soon as you turn on</p> <p>14 the water hose, they attack the hose and are trying to</p> <p>15 drink out of the hose.</p> <p>16 You fill their bowl and the whole entire</p> <p>17 large bowl disappears because they are so thirsty, this</p> <p>18 tells me as someone who has worked 20 years in this</p> <p>19 profession, that pet did not have care the day before,</p> <p>20 maybe two days before, and when I worked in the facility</p> <p>21 where we took care of up to 50 dogs in a very similar</p> <p>22 situation, very similar size and type of kennels, we would</p> <p>23 pooper scoop every day, make sure the water bowl was</p> <p>24 filled every day and I've never, never in all of those</p>	<p>1 Number 42, which just has been placed in front of you.</p> <p>2 A. Do you want me to hold this one?</p> <p>3 Q. Yes, you can pick it up. What is Exhibit</p> <p>4 Number 42?</p> <p>5 A. This is a letter that the volunteers and</p> <p>6 myself put together to -- these are the issues that all of</p> <p>7 the volunteers, we all sat down together, and as a group,</p> <p>8 when I became president, this is -- these are issues that</p> <p>9 they had worked on previous to me even becoming</p> <p>10 president. I've been a volunteer even prior to becoming</p> <p>11 president, and they asked me to address these items with</p> <p>12 the County, and at the time, the County was telling us</p> <p>13 that the Sheriff is the person that we should relay these</p> <p>14 concerns to, so we all sat down as a group and made this</p> <p>15 letter and then I took it to him.</p> <p>16 Q. And who at the County informed you that the</p> <p>17 Sheriff was the person to whom you should send the letter?</p> <p>18 A. The Board of -- we were getting that</p> <p>19 information from the Board of Supervisors, but I can't be</p> <p>20 exact on those details.</p> <p>21 Q. Okay. Okay, and was this letter written on</p> <p>22 February 6, 2011?</p> <p>23 A. I'm sorry, so the president prior to me had</p> <p>24 had these similar discussions with the Sheriff and Board</p>

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1	of Supervisors.	1	A. No.
2	Q. Okay.	2	Q. Okay. You are not a licensed veterinarian?
3	A. And that prior president gave me that	3	A. No.
4	information.	4	Q. Okay, and you never attended vet school?
5	Q. I understand, okay. But this letter was	5	A. No.
6	written on February 6, 2011; is that right?	6	Q. Okay. And you've never worked at a vet's
7	A. Yes.	7	office?
8	Q. Okay, and did you consult an attorney when	8	A. Yes.
9	you drafted this letter?	9	Q. You have?
10	A. No, I didn't.	10	A. Yes.
11	Q. But apparently, you must have done some	11	Q. At the clinic?
12	research because it looks like you are citing statutes or	12	A. At private practices.
13	Code Sections?	13	Q. Okay.
14	A. Yes; as I said before, I've worked in	14	A. And also at Virginia Tech Veterinary
15	veterinary medicine for 20 years, and I understand the	15	Hospital.
16	protocols and laws that are put forth and governs a	16	Q. Okay.
17	shelter or any facility that shelters animals, that there	17	A. And at the veterinary school which is
18	are those laws and governing bodies.	18	within the veterinary hospital.
19	Q. What is your experience in veterinary	19	Q. Can you describe for me what it is that you
20	medicine?	20	did, what your title was, for instance, when you worked at
21	A. I've done a lot of different things, but I	21	these various places?
22	think that, for a shelter, I volunteered at a lot of	22	A. Over the years, I had different jobs. I
23	shelters. I volunteered at Montgomery County Humane	23	worked in the business office, I've worked in the
24	Society, which is a no kill facility; I've been involved	24	laboratory. My exact -- one of the jobs, I will call it a
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1	with the Montgomery County pound and a lot of their	1	glorified kennel helper, but I was a lab technician was my
2	volunteers, and that is where I learned a lot of	2	title, and that is when I was on the team that we took
3	information, before becoming a volunteer with Giles Animal	3	care of all of the teaching dogs and the research dogs and
4	Rescue.	4	we made sure that their kennels were properly cleaned
5	Q. So your experience is a lot of hands-on --	5	every day and that they had proper bedding.
6	A. Hands-on.	6	Q. Okay.
7	Q. Hold on a second.	7	A. And that is where I learned where the
8	A. Sorry.	8	space -- what the space requirements are for a shelter,
9	Q. A lot of hands-on experience at various	9	for the space that the dog is housed, and all of those
10	shelters; is that what you are saying?	10	types of things.
11	A. Yes, and working at veterinary clinics and	11	Q. Okay. Looking at the issues that you
12	primarily at Virginia Tech, the veterinary teaching	12	highlighted in this 2011 letter --
13	hospital and school, and at the veterinary school, they	13	A. Yes.
14	have up to -- I was on a team where we took care of up to	14	Q. -- do these issues persist into the Year
15	50 dogs and cats, and they were housed in a very similar	15	2013?
16	situation like a shelter, and I was involved with writing	16	A. The situation with the lights being on a
17	process for the protocols, the laws, and any time the laws	17	timer, that was resolved.
18	would change, you know, what would have to be updated to	18	Q. Okay.
19	the way that we would take care of the animals.	19	A. But other than that, I would say no, they
20	Q. Okay, did you receive any education in this	20	were not resolved.
21	area, not work experience, and let me just say the great	21	Q. Okay. And that these issues persisted in
22	caveat here is work experience is an education, but aside	22	2013, other than the timer?
23	from that, did you receive any education in the area of	23	A. Yes.
24	veterinary medicine or care?	24	Q. Okay. And -- all right, and so let's move

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<p>1 back into 2013, I think that you said that you were 2 sending emails to the Sheriff at that time, or letters in 3 February? 4 A. Primarily communicating by email at that 5 time. 6 Q. Okay. And did the Sheriff ever respond to 7 your emails? 8 A. Once that I remember, and that was when I 9 brought to his attention that an adoption had occurred 10 where they did not collect a spay/neuter deposit from the 11 person adopting. 12 Q. Okay. 13 A. And he did respond; he responded, but not 14 that it was resolved in response, but his response was 15 that -- 16 Q. What was your understanding? 17 A. I knew that he received the email, let's 18 say. 19 Q. Okay, thank you. What is your 20 understanding of the proper policy for the spay/neuter 21 refund policy? 22 A. It is if you look in the Giles County 23 laws -- laws is not the right word. 24 Q. Ordinance?</p>	<p>1 A. This is a photocopy of the form that is 2 given to people when they adopt a pet from the shelter, 3 and this bottom portion is what they are supposed to. 4 When they go to have the pet spayed or neutered, they are 5 to take this form to the vet's office and ask the vet to 6 complete the bottom portion and to mail it in to the 7 officer, the animal control officer, who then will 8 authorize that their \$150 deposit be returned. 9 Q. Okay. And now, I will let you know that 10 Ms. Jones looked at this document earlier and testified 11 that, I believe, that from the information on this form, 12 it indicated that the pet that was being adopted was 13 already neutered? 14 A. It was not, and I have veterinary records 15 to back that up, so what happened is this Nance family 16 came to me the very next day and they said that we've 17 adopted this dog, and we can't afford to neuter it but we 18 want to get it neutered, can you help us, and I said yes, 19 ma'am, and I gave them a free spay and neuter certificate, 20 which I have authorization to do with Virginia Tech 21 because I work with the program there at Virginia Tech, so 22 I gave them the certificate, and they did go and have the 23 dog neutered and then brought me the paperwork that it had 24 been spayed and neutered, and I also spoke with the staff</p>
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<p>1 A. Ordinances, thank you, the Giles County 2 ordinances, that if a pet is not known to be spayed and 3 neutered, then the person adopting must pay the \$150 4 deposit. 5 Q. Okay. 6 A. And then once they have the pet spayed or 7 neutered and they provide proof from a veterinarian that 8 this was done, then the County will refund the \$150 9 deposit. 10 Q. Okay. 11 A. Plus, plus, the person has to pay a \$20 12 adoption fee. 13 Q. All right, and something occurred that made 14 you think that that wasn't happening; is that right? 15 A. Yes. 16 Q. Okay. 17 A. So as I said before, our group advocates 18 spaying and neutering, and we do what we can in the 19 community to provide assistance to people who can't 20 afford spay/neuter, so I believe on April 6th -- 21 Q. Here, let me show you, does this document 22 help you? 23 A. Yes, it does. 24 Q. What is this document?</p>	<p>1 that also verified that it was done. 2 Q. Okay. And you say that you spoke with -- 3 is that a Sammy Nance? 4 A. Yes, Mr. Nance and his wife, Mrs. Nance. 5 Q. Okay. And they indicated to you that the 6 dog was not neutered when they adopted the animal? 7 A. Correct, and so Mrs. Nance said to me, I 8 asked her, I said, so they let you adopt the dog, so I 9 wanted to make sure that I was very clear that I got all 10 of the proper details, because I knew that this was very 11 serious, I said to her, so they allowed you to adopt the 12 dog and it was -- and you, even though you stated that you 13 could not afford to spay and neuter, she -- her response 14 was, Chastity told us to just promise to make sure that we 15 did get it done. 16 Q. Okay. 17 A. That this time, she -- that Chastity said 18 to them, she understood that they could not afford it, but 19 she wanted to save the dog. Chastity was so worried about 20 saving the dog that she let -- she allowed it. 21 Q. Okay. All right. And what is on the 22 second page of this document? 23 A. The second page is the receipt where the 24 people did pay the \$20 adoption fee.</p>

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<p>1 Q. Okay. And have you ever seen -- well, let 2 me ask you this: Did you ever process adoptions at the 3 shelter? 4 A. Oh, yes. 5 Q. Would you fill out these receipts yourself? 6 A. Yes, there was a standard receipt book that 7 we were required to fill out and we did so. 8 Q. And the amount indicated on this receipt so 9 how much? 10 A. \$20 cash. 11 Q. Okay. 12 A. A spay/neuter deposit is taken in, and if 13 it's taken in, it is on a separate receipt. Would you 14 like to see an example? 15 Q. I would. 16 A. And they purposely -- I'm not sure why, but 17 they actually had separate receipt books for that 18 situation. I guess because they wanted to make sure that 19 they were tracking it and they gave the person their 20 deposit back, perhaps. 21 Q. Okay. 22 A. So yes, so this is a situation where this 23 person adopted a dog and they actually wrote the two 24 separate receipts, the \$20 for the adoption and the \$150</p>	<p>1 Q. Do you know an April Lowry? 2 A. Yes. 3 Q. Who is April Lowry? 4 A. She's one of the long-term volunteers of 5 our group. I believe that she was in the original group 6 that founded in 1999. She's been a volunteer since then. 7 She's been -- I think that she served as the president at 8 one point in time, and she's been a rescue coordinator for 9 the group for a long time. 10 Q. Okay. Did you ever have any discussion 11 with Ms. Lowry or any other members of GCAR about what 12 could be done at the shelter to remedy some of these 13 issues? 14 A. Our primary focus was to try to replace the 15 employee that we felt was not doing their job. 16 Q. And who was that? 17 A. Chastity. 18 Q. Okay, and was there ever any discussion 19 about putting in new devices at the shelter, such as a 20 time clock or cameras? 21 A. Yes, we strongly encouraged the County to 22 do that and offered to pay for that, because we felt so 23 passionate about having that documentation and 24 accountability for the staff.</p>
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<p>1 for the spay and neuter deposit. 2 MR. STRELKA: Okay, I'm not going to make 3 this a separate Exhibit; I will just go by her 4 testimony that two receipts were made, unless you 5 have an objection that you want it included. 6 MR. GUYNN: No, that is okay. 7 BY MR. STRELKA: 8 Q. So you can take this back, so this is your 9 testimony that two receipts were created. How do we know 10 that there was not a separate receipt for \$150 for this? 11 A. I'm not aware; I'm just going by the people 12 who adopted the dog and came to me and asked for 13 spay/neuter assistance. 14 Q. Okay, had you ever encountered any other 15 issue similar to this specific issue at the shelter 16 regarding adoption fees? 17 A. We were suspicious that certain people were 18 allowed to adopt without doing the \$150 spay/neuter 19 deposit, but this is the first time that I was able to 20 actually get the proof. 21 Q. Okay, I understand. Okay. And -- 22 A. It seemed to me like when there were 23 friends who wanted to adopt certain dogs, that it was 24 often waived.</p>	<p>1 Q. Okay, and to whom did you actually 2 physically offer, make this offer to? 3 A. It was in a meeting with the Sheriff, and I 4 believe that it was Chris McKlarney that was there, yes. 5 Q. And did you speak and make this offer or 6 did someone else from GCAR? 7 A. I was there offering that the vice 8 president, Mr. Herbert, was also at the same meeting. 9 Q. Okay. All right. And did anyone ever take 10 you up on that ever? 11 A. No, they did not. 12 Q. Did you ever hear at any time that cameras 13 cannot be put at the shelter because of financial reasons? 14 A. Well, no -- well, I'm not sure if they said 15 that or not. I do know that we offered to pay to install 16 the cameras because we felt also passionate about that. 17 Q. Okay, I understand. Were you ever 18 physically present when Ms. Perkins was working? 19 A. Yes. 20 Q. And did you ever have any concerns about 21 the way in which she conducted her affairs at the 22 office -- at the shelter? 23 A. Yes, one particular instance, she -- I went 24 to the shelter, and normally the volunteers would not</p>

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<p>1 arrive at the shelter until around 2:00, and so it was</p> <p>2 typical that Ms. Perkins would come just prior to us to</p> <p>3 clean, water, feed, so that the shelter would be ready for</p> <p>4 the public and the volunteers to arrive, but on that</p> <p>5 particular day, I had to go early to get a lot of things</p> <p>6 done, and I will spare you the details, but I had to</p> <p>7 return a lot of crates and wash them out, and so Chastity</p> <p>8 arrived; there were only three dogs in the shelter at that</p> <p>9 time, because we had just done a large transport. We had</p> <p>10 rescued and pulled a lot of dogs and taken them to a no</p> <p>11 kill sanctuary, so she was there to feed and water and</p> <p>12 clean the kennels, maybe 20 minutes tops, and then she</p> <p>13 left, and that is when I observed that she was not</p> <p>14 changing out dirty water bowls.</p> <p>15 Q. Okay.</p> <p>16 A. And the water bowls, it was obvious to me,</p> <p>17 because again, I'm worked 20 years and I've cleaned a lot</p> <p>18 of water bowls, and if you are cleaning them properly,</p> <p>19 they get a buildup from the saliva of the dog. There is a</p> <p>20 lot of buildup around the edge of the water bowl.</p> <p>21 Q. Like a film?</p> <p>22 A. Like a thick film, and once it dries, I</p> <p>23 mean, you can hardly chisel that stuff out of there for</p> <p>24 soaking for a long time and properly brush cleaning it,</p>	<p>1 A. This is my handwriting.</p> <p>2 Q. You wrote this?</p> <p>3 A. Yes.</p> <p>4 Q. And when did you write this?</p> <p>5 A. When did I write this?</p> <p>6 Q. Yes, ma'am.</p> <p>7 A. I don't remember. It's whenever I made</p> <p>8 this photocopy, because I knew that I was going to be</p> <p>9 having a meeting with the Sheriff, but then he didn't want</p> <p>10 to see documentation.</p> <p>11 Q. Okay. Was this in 2013?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. Thank you. I just wanted to make</p> <p>14 sure that I could identify who wrote that.</p> <p>15 A. Okay.</p> <p>16 Q. All right. Now, I would like you to take a</p> <p>17 look at Exhibit Number 43.</p> <p>18 A. Okay.</p> <p>19 Q. I will represent to you that this is a</p> <p>20 three-page document with emails on it. Let's look at the</p> <p>21 bottom email, on the first page, it says From Giles County</p> <p>22 Animal Rescue to Chris McKlarney on Sunday, January 27,</p> <p>23 2013.</p> <p>24 A. Okay.</p>
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<p>1 but if you just properly wash, and like you would your</p> <p>2 glass before you drink out of it, if you just washed it</p> <p>3 every day, you would not get that buildup, and at that</p> <p>4 time, it was my observation that all of the water bowls,</p> <p>5 buckets, food bowls, were all -- all had this residue</p> <p>6 because they were not being properly cleaned, and then</p> <p>7 from that particular day, when I was there, when she came</p> <p>8 to clean, it was quite obvious why; she was just hosing</p> <p>9 out the bowl and refilling it. It was never cleaning,</p> <p>10 proper cleaning of the bowls which is also a disease</p> <p>11 control issue.</p> <p>12 MR. STRELKA: Okay. I'd like to mark this</p> <p>13 as the next Exhibit, please.</p> <p>14</p> <p>15 (The above-mentioned document was marked as</p> <p>16 Deposition Exhibit Number 43 and entered into the</p> <p>17 Deposition.)</p> <p>18</p> <p>19 BY MR. STRELKA:</p> <p>20 Q. Before we get to Exhibit Number 43, I want</p> <p>21 to take a look at the back of Exhibit Number 41, because</p> <p>22 there is some handwritten notes there.</p> <p>23 A. Hmm-hmm.</p> <p>24 Q. Is this your handwriting?</p>	<p>1 Q. And the third page says, "Thank you,</p> <p>2 Christine." So may I assume that you wrote this email?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. And the second line of your email,</p> <p>5 it says, "I am pleading today to engage your help in</p> <p>6 setting up a second meeting." Do you recall the first</p> <p>7 meeting?</p> <p>8 A. Yes.</p> <p>9 Q. And when was the first meeting?</p> <p>10 A. A week or two before this.</p> <p>11 Q. Okay. And who was at this meeting?</p> <p>12 A. The Sheriff.</p> <p>13 Q. Okay.</p> <p>14 A. And Melvin Dalton and Chris McKlarney and</p> <p>15 Charlie, I believe.</p> <p>16 Q. And what was discussed at the meeting?</p> <p>17 A. I think that that is when we -- we really</p> <p>18 didn't have a chance to speak much. We were just kind of</p> <p>19 being told at that meeting that we were probably not going</p> <p>20 to be allowed to volunteer there, that we were not going</p> <p>21 to have access to the key and not have a key hanging on</p> <p>22 the gate anymore, and they wanted volunteers to come and</p> <p>23 check out a key at the dispatch office, and we were</p> <p>24 basically accused of things that were being stolen, that</p>

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<p>1 we were using the place as a hang out, and that the actual</p> <p>2 issues that we wanted to talk about were not discussed.</p> <p>3 Q. I understand. Okay. All right. I'm going</p> <p>4 to say this, I believe that I marked this particular email</p> <p>5 as an Exhibit earlier.</p> <p>6 MR. GUYNN: It looks familiar, but...</p> <p>7 MR. STRELKA: But rather than chasing it</p> <p>8 down, do you mind if we stick another sticker on</p> <p>9 it?</p> <p>10 MR. GUYNN: No, that is okay.</p> <p>11</p> <p>12 (The above-mentioned document was marked as</p> <p>13 Deposition Exhibit Number 44 and entered into the</p> <p>14 Deposition.)</p> <p>15</p> <p>16 MR. STRELKA: Off the Record.</p> <p>17</p> <p>18 (Off the Record.)</p> <p>19</p> <p>20 BY MR. STRELKA:</p> <p>21 Q. All right, please take a look at Exhibit</p> <p>22 Number 44. Do you recall sending the second email dated</p> <p>23 January 31, 2013 at 4:27 p.m.?</p> <p>24 A. Which one are we look at?</p>	<p>1 MR. GUYNN: Right, but -- were you asking</p> <p>2 if there was a long email on Exhibit Number 23.</p> <p>3 MR. STRELKA: Yes.</p> <p>4 MR. GUYNN: This is -- okay, so this is</p> <p>5 23.</p> <p>6 MR. STRELKA: 23, I gave you a copy of</p> <p>7 whenever we admitted 23, is that 23? This is 23.</p> <p>8 Okay, 23 was admitted the other day.</p> <p>9 MR. GUYNN: Okay. I didn't bring it.</p> <p>10 Okay. I guess that is where our system is</p> <p>11 different. I don't bring every deposition exhibit</p> <p>12 from a week ago with me.</p> <p>13 MR. STRELKA: Right, okay.</p> <p>14 MR. GUYNN: That is fine.</p> <p>15 (Off the Record.)</p> <p>16 BY MR. STRELKA:</p> <p>17 Q. I will let you take a moment and review</p> <p>18 Exhibit Number 23. This is the email on the bottom half</p> <p>19 of Exhibit Number 23, on the first page, you wrote this</p> <p>20 email that extends to the next couple of pages; is that a</p> <p>21 yes?</p> <p>22 A. Yes.</p> <p>23 Q. And do you remember the circumstances</p> <p>24 surrounding that?</p>
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<p>1 Q. Exhibit Number 44, the email on the bottom</p> <p>2 half of the page; I just want to know if you recall</p> <p>3 sending that email.</p> <p>4 A. Yes.</p> <p>5 Q. Okay. And I'd like to show you what was</p> <p>6 been previously marked as Exhibit Number 23, okay, and why</p> <p>7 don't we put this one back in the pile, and put the other</p> <p>8 one in the pile, too.</p> <p>9 A. Okay.</p> <p>10 Q. And do you recall sending out the long</p> <p>11 email that begins in the bottom of that first page and</p> <p>12 extends throughout the rest of the document?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. And do you recall the circumstances</p> <p>15 surrounding your issuance of that email?</p> <p>16 A. Yes.</p> <p>17 Q. Can you describe the circumstances?</p> <p>18 A. So --</p> <p>19 MR. GUYNN: I'm sorry, I'm confused now.</p> <p>20 This is a one-page --</p> <p>21 MR. STRELKA: Well, we moved on. I just</p> <p>22 wanted had he to authenticate and identify that</p> <p>23 that was an email that she sent, Exhibit Number</p> <p>24 44, now I've just handed her Exhibit Number 23.</p>	<p>1 A. Yes.</p> <p>2 Q. And what were the circumstances surrounding</p> <p>3 the time where you wrote that letter?</p> <p>4 A. So the Giles Animal Rescue, the Board</p> <p>5 members, after many attempts to work with the County to</p> <p>6 resolve matters at the shelter, we felt that, very</p> <p>7 strongly, and because of the accusations against the</p> <p>8 volunteers, that we weren't doing thing correctly, that we</p> <p>9 were actually stealing, doing things we weren't supposed</p> <p>10 to be doing, we decided in the best interests of the</p> <p>11 volunteers that we should basically pull away and no</p> <p>12 longer volunteer at the shelter, because it was obvious</p> <p>13 that the County did not want to work with us; they wanted</p> <p>14 to do -- we felt like this was the only way to get help</p> <p>15 for the animals was to sort of pull back.</p> <p>16 It was a very tough decision. I cried</p> <p>17 tears over this decision. Our members wholeheartedly</p> <p>18 agreed that this was the best decision at the time,</p> <p>19 though, and that because the Sheriff was refusing to work</p> <p>20 with us, that we needed to pull back and not volunteer at</p> <p>21 the shelter, and -- because they were -- the staff were</p> <p>22 just making it impossible and too stressful for the</p> <p>23 volunteers.</p> <p>24 Q. Okay. And did you ever have -- did you</p>

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<p>1 ever have any issues with Ms. Perkins allegedly posting</p> <p>2 some things on the Internet that you found to be</p> <p>3 inappropriate about the shelter or about GCAR?</p> <p>4 A. You know, stuff like that, I don't really</p> <p>5 get into things on social media.</p> <p>6 Q. Okay.</p> <p>7 A. If that happened, I don't even remember</p> <p>8 it. I put it out of my mind.</p> <p>9 Q. Okay. And the Giles County -- let me see,</p> <p>10 the Giles shelter, did they have a Facebook page?</p> <p>11 A. They do. Well, they still do, yes.</p> <p>12 Q. Okay. And do you recall making a complaint</p> <p>13 about there being unprofessional posts from Chastity on</p> <p>14 that Facebook page?</p> <p>15 A. It is possible.</p> <p>16 Q. Okay.</p> <p>17 A. It's possible. I remember addressing</p> <p>18 several unprofessional posts by -- that occurred several</p> <p>19 different times, but I don't remember who actually posted</p> <p>20 those things. I just remember bringing them to the</p> <p>21 attention of the County that they need to be careful what</p> <p>22 they are allowing their employees to post.</p> <p>23 Q. Do you recall some of the messages that</p> <p>24 were posted?</p>	<p>1 Q. Does that refresh your memory in any way?</p> <p>2 A. Yes, it does.</p> <p>3 Q. Okay.</p> <p>4 A. So they -- I believe that one of the</p> <p>5 comments was that we were refusing to help, and at that</p> <p>6 time, that was not the truth, that we were not allowed to</p> <p>7 go to the shelter at the time.</p> <p>8 Q. Okay.</p> <p>9 A. But yet, they were trying to make it in the</p> <p>10 press look like we -- it's complicated.</p> <p>11 Q. Okay. Who is "they"? When you say they</p> <p>12 were trying to make it look like something in the press,</p> <p>13 who are you talking about?</p> <p>14 A. The people who put this in the paper and</p> <p>15 on Facebook, and I don't know who did those, because I'm</p> <p>16 not on the other side; I don't know who submitted those</p> <p>17 things to the paper, I'm just saying that these are things</p> <p>18 that I observed happened, so I brought them to the</p> <p>19 attention of the County, that we didn't really appreciate</p> <p>20 that they were slandering, that we would no longer help --</p> <p>21 we felt that this was slander against our group because we</p> <p>22 were no longer helping at the shelter.</p> <p>23 Q. And that wasn't true?</p> <p>24 A. That was correct.</p>
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<p>1 A. Not off the top of my head. I would have</p> <p>2 to go back through records to look.</p> <p>3 Q. All right. All right, this is a previous</p> <p>4 Exhibit Number 24, a two-page document. That is the last</p> <p>5 of old Exhibits. Okay. All right. Ma'am, I would like</p> <p>6 you to take a look at what has been previously been</p> <p>7 identified, excuse me, as Exhibit Number 24. Let's look</p> <p>8 at the email that begins on the very bottom of the first</p> <p>9 page and extends to the second page.</p> <p>10 A. Okay.</p> <p>11 Q. Do you recall sending this email?</p> <p>12 A. Yes.</p> <p>13 Q. Okay.</p> <p>14 A. Hmm-hmm.</p> <p>15 Q. And I want you now to focus your attention</p> <p>16 on, unfortunately, the -- what appears to be the body of</p> <p>17 an email on the top half of the first page.</p> <p>18 A. Hmm-hmm.</p> <p>19 Q. I would like you to read the text here to</p> <p>20 yourself.</p> <p>21 A. Okay.</p> <p>22 Q. And do you recall sending an email with</p> <p>23 that text?</p> <p>24 A. Yes, yes.</p>	<p>1 Q. Okay. And -- all right. Do you know a</p> <p>2 Sheryl Helsel? Maybe I'm saying it wrong. She may be an</p> <p>3 investigator for the Department of Agriculture?</p> <p>4 A. Yes.</p> <p>5 Q. Okay, at some point, you made a, for lack</p> <p>6 of a better term, complaint to the Department of</p> <p>7 Agriculture; is that right, about the shelter?</p> <p>8 A. Yes.</p> <p>9 Q. And why did you do that?</p> <p>10 A. To be honest with you, I had a very long</p> <p>11 discussion with the animal control officer of another</p> <p>12 facility and I said, these are some concerns that I have,</p> <p>13 because I wanted to know, you know, how -- I actually went</p> <p>14 to their shelter so I could learn how, because I knew that</p> <p>15 shelter was run properly, and I wanted to learn all that I</p> <p>16 could, and in conversation with that animal control</p> <p>17 officer, and he was also the person who was the manager of</p> <p>18 that particular shelter, after a long conversation with</p> <p>19 him about the concerns that I had seen in the Giles</p> <p>20 shelter, he actually gave me her business card and he</p> <p>21 said, this is who you need to take your concerns to if you</p> <p>22 are not getting anywhere with the people who are supposed</p> <p>23 to be running that shelter.</p> <p>24 Q. Okay, and what -- where was this other</p>

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<p>1 shelter?</p> <p>2 A. It was Salem.</p> <p>3 Q. The Salem shelter?</p> <p>4 A. Yes.</p> <p>5 Q. And who was the animal control officer that</p> <p>6 you were speaking with?</p> <p>7 A. I have his business card at home but I</p> <p>8 didn't bring it with me, but he's now retired.</p> <p>9 Q. You can't recall his name?</p> <p>10 A. Not off the top of my head, but I do have</p> <p>11 his business card.</p> <p>12 Q. That is okay. All right, so at that point</p> <p>13 you determined that you would do this?</p> <p>14 A. Yes, and -- yes, and all of the information</p> <p>15 is information that for three years, in the time that</p> <p>16 volunteers would come to me and say, this is something</p> <p>17 that I have a concern about, my answer would always be</p> <p>18 Number One, I need documentation, it can't be just your</p> <p>19 word, I have to have documentation. If you want me it to</p> <p>20 address a situation, I can't do it without documentation,</p> <p>21 so for years, every time that a volunteer brought anything</p> <p>22 to me with concerns, and documentation of it, I would file</p> <p>23 it away, and so what I did, once I was encouraged to</p> <p>24 contact Ms. --</p>	<p>1 and retrieve all of their items. We weren't told why of</p> <p>2 course, we knew that we had already told them that we</p> <p>3 didn't want to volunteer there until changes were made, so</p> <p>4 my assumption was, oh, they want us to come and get their</p> <p>5 things because we told them that we would not volunteer</p> <p>6 there until things changed, so I went to the shelter with</p> <p>7 Charlie Herbert who retrieved the volunteer things, and</p> <p>8 the animal control officer was obviously irate with me,</p> <p>9 and again, I had no idea that any -- that anything that I</p> <p>10 sent to Ms. Helsel had been -- I didn't even know if she</p> <p>11 received it; I didn't know what she was doing with the</p> <p>12 information, I did not know that she had even been to the</p> <p>13 shelter.</p> <p>14 All I know is I needed to come to the</p> <p>15 shelter and retrieve our volunteer things and that is what</p> <p>16 I did, with a very friendly manner, and it was quite</p> <p>17 obvious as soon as I got there, something had happened,</p> <p>18 because the animal control officer was irate with me, and</p> <p>19 very unprofessional, and when I asked, what is wrong, why</p> <p>20 are you so angry with me, they basically just told me I</p> <p>21 needed to leave, I had hurt a lot of people and I needed</p> <p>22 to leave and never come back, that no one in our group</p> <p>23 should ever come back to the shelter.</p> <p>24 Q. Okay.</p>
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<p>1 Q. Sheryl, her name is written here.</p> <p>2 A. I have trouble with it every day.</p> <p>3 Q. Her name is written there on the email.</p> <p>4 A. So I took it to the Department of</p> <p>5 Agriculture.</p> <p>6 Q. I just wanted you to see her name.</p> <p>7 A. Yes, Ms. Helsel, so he basically went back</p> <p>8 to my records of things that I had been compiling for over</p> <p>9 three years and sent her everything that I had, and I</p> <p>10 didn't -- and when I did that, I actually thought that it</p> <p>11 would be anonymous. I didn't know how things worked like</p> <p>12 this; I had never done had before, and not a single person</p> <p>13 knew I was doing it. I did it on my own; I didn't tell</p> <p>14 anyone in our animal rescue group that I was doing it, I</p> <p>15 did it as a concerned citizen, not as a person who was a</p> <p>16 member of the animal rescue group, so I want to make that</p> <p>17 very clear.</p> <p>18 Q. And what happened after you did that? Did</p> <p>19 someone from the department reach out to you, right?</p> <p>20 A. No, not really.</p> <p>21 Q. Okay.</p> <p>22 A. Basically, the first thing that happened is</p> <p>23 I received a letter from the sheriff's department saying</p> <p>24 that the animal rescue group needed to come to the shelter</p>	<p>1 A. And we had -- sorry, and so we had a locked</p> <p>2 cabinet that we kept our supplies in, and we had our own</p> <p>3 supply cabinet that we kept locked because of the problem</p> <p>4 where things would constantly disappear, and the irony,</p> <p>5 things in our locked cabinet that we had a key to never</p> <p>6 disappeared, and this is something that we brought up in</p> <p>7 meeting where we had accusations about things</p> <p>8 disappearing, but nothing in our own locked cabinet was</p> <p>9 disappearing, so we had dog food and cat food in the</p> <p>10 cabinet because of the reason that we weren't allowed to</p> <p>11 have access to the shelter supplies and we wanted to have</p> <p>12 access to food, and if a person would surrender an animal</p> <p>13 or they found astray, we needed to feed it and I tried to</p> <p>14 offer that food to the animal control officer and he</p> <p>15 refused it and I said, what is going on, why are you</p> <p>16 refusing a donation of food, it's just food, take it, keep</p> <p>17 it, and that is when the angry statement came that I</p> <p>18 should leave and never come back.</p> <p>19 Q. Is that Mr. Dalton who said that?</p> <p>20 A. No, that was from Frank.</p> <p>21 Q. Frank Gough?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. And you said that he was irate. Do</p> <p>24 you recall any other statements that he made that</p>

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<p>1 you've -- that you thought might be inappropriate?</p> <p>2 A. Well, it was just his whole entire body</p> <p>3 language and the fact that he was -- he had his hand on</p> <p>4 his guns the whole time in a very scary aggressive body</p> <p>5 language towards me, which was very frightful.</p> <p>6 Q. Okay. And -- all right. So if this was a</p> <p>7 time line of events, what happened after that?</p> <p>8 A. So again, I still have no idea what is</p> <p>9 really going on; I'm just trying -- I'm assuming that</p> <p>10 something must have happened, and honestly, I don't even</p> <p>11 remember how I eventually found out -- oh, I do know. So</p> <p>12 the next thing, this is how I found out that the person</p> <p>13 had come and done the inspection at the shelter, is a</p> <p>14 reporter called me and she said, oh, yes, I have all of</p> <p>15 the information that you sent to Ms. Helsel, the State,</p> <p>16 about the shelter, and that is when I realized that the</p> <p>17 inspection had been done, because a reporter provided a</p> <p>18 copy of the report to me.</p> <p>19 MR. STRELKA: Okay. All right. And I'd</p> <p>20 like to have this admitted as the next Exhibit,</p> <p>21 please.</p> <p>22</p> <p>23 (The above-mentioned document was marked as</p> <p>24 Deposition Exhibit Number 45 and entered into the</p>	<p>1 first subject, and I was trying to clarify with her, are</p> <p>2 you the person that I need to give information to, and she</p> <p>3 did clarify yes, send it to me.</p> <p>4 Q. Okay. And I notice on the email heading up</p> <p>5 top, it says "Attachments."</p> <p>6 A. Yes.</p> <p>7 Q. And then it looks to be the file names of</p> <p>8 digital pictures or photographs, so you attached</p> <p>9 photographs this?</p> <p>10 A. Yes.</p> <p>11 Q. These photographs, did you take them</p> <p>12 yourself or were they taken by other members of GCAR?</p> <p>13 A. I took some of the photographs; most of</p> <p>14 them were taken by other volunteers. Again, as he said,</p> <p>15 over the years, whenever someone would come to me with a</p> <p>16 concern, I would ask for documentation, and they were very</p> <p>17 good to provide it.</p> <p>18 Q. Okay. And so these -- these animals that</p> <p>19 you that you are describing here, and each paragraph kind</p> <p>20 of describes a different animal, Dixie, Spike, Chastity,</p> <p>21 Crystal, the incidents described regarding these</p> <p>22 particular animals, do we know when these incidents</p> <p>23 occurred?</p> <p>24 A. So for each of these I sent her their case</p>
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<p>1 Deposition.)</p> <p>2</p> <p>3 BY MR. STRELKA:</p> <p>4 Q. I'd like you to take a moment and look at</p> <p>5 what has been labeled as Exhibit Number 45.</p> <p>6 A. Okay.</p> <p>7 Q. And do you recall sending this email?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And why did you send this email?</p> <p>10 A. Because I felt it was the right thing to</p> <p>11 do, that animals were not being taken care of.</p> <p>12 Q. Okay. And had -- did the -- and I know</p> <p>13 that you are sending this to the investigator for the</p> <p>14 Virginia Department of Agriculture, did she request that</p> <p>15 you send her this email; do you recall?</p> <p>16 A. No.</p> <p>17 Q. Okay. So you did it just to provide her</p> <p>18 with this information?</p> <p>19 A. I just basically -- the very first email</p> <p>20 that I sent her, I may have stated, I have information</p> <p>21 about the shelter and the care of the animals there that I</p> <p>22 would like to share with you, and I'm going to be sending</p> <p>23 you several emails, and that was the first email that I</p> <p>24 sent to her. That was basically how I approached the</p>	<p>1 numbers for each one, but I don't -- but I don't see the</p> <p>2 email where I provided the case numbers, and so if you had</p> <p>3 the case number, then you could look up the shelter</p> <p>4 records and it would give you the dates, and the case</p> <p>5 number for any animal that came in, if it was in the Year</p> <p>6 2011, the case number would usually be an 11 and then the</p> <p>7 number, so you would know which year just by that.</p> <p>8 Q. Okay. But were all of these animals that</p> <p>9 were identified, that you were identifying here for the</p> <p>10 Department of Agriculture, were these animals that were</p> <p>11 housed at the shelter at the time that Sheriff Millirons</p> <p>12 was elected?</p> <p>13 A. Yes, these are all pets within the past</p> <p>14 three years.</p> <p>15 Q. Okay.</p> <p>16 A. I'm sorry, three years prior to 2013.</p> <p>17 MR. STRELKA: Okay. I'd like to have this</p> <p>18 marked as the next Exhibit.</p> <p>19</p> <p>20 (The above-mentioned document was marked as</p> <p>21 Deposition Exhibit Number 46 and entered into the</p> <p>22 Deposition.)</p> <p>23</p> <p>24 BY MR. STRELKA:</p>

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<p>1 Q. I would like you to take a moment and look</p> <p>2 at Exhibit Number 46. Did you write this email?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. And do you see the third paragraph?</p> <p>5 A. Yes.</p> <p>6 Q. I read this paragraph to Ms. Jones,</p> <p>7 formerly Ms. Perkins, and she denied all of the incidences</p> <p>8 contained within this paragraph. Did you personally</p> <p>9 witness this?</p> <p>10 A. I was not there that particular day. There</p> <p>11 were two volunteers that were there, and they called me</p> <p>12 from the shelter because they were so shocked at the</p> <p>13 conditions, because they had been there many times and</p> <p>14 they never had seen it that way. When they came, arrived</p> <p>15 that day and they said, what do we need to do, and I said,</p> <p>16 you need to take some pictures because we need to document</p> <p>17 this.</p> <p>18 Q. Okay.</p> <p>19 A. And that is what happened. They took</p> <p>20 pictures, and this was the day when the dogs were just</p> <p>21 coated. I mean, and the pictures cannot justify how bad</p> <p>22 it was that their hair coat was just caked with feces</p> <p>23 because their kennels had not been cleaned in so long and</p> <p>24 they were just having to -- when they needed to rest, they</p>	<p>1 BY MR. STRELKA:</p> <p>2 Q. Did you send this email?</p> <p>3 A. Yes.</p> <p>4 Q. And do you recall who the volunteers who</p> <p>5 witnessed this were?</p> <p>6 A. Yes.</p> <p>7 Q. Who were they?</p> <p>8 A. It was Angie -- I'm trying to remember her</p> <p>9 last name because it's changed, but her first name was</p> <p>10 Angie. I could look it up for you if you needed it, and</p> <p>11 Amanda; they were the two volunteers that went that day,</p> <p>12 and they were just very upset because Chastity just</p> <p>13 continued to provoke this dog and thought that it was so</p> <p>14 funny to get it to be afraid, and it would aggressively</p> <p>15 try to attack the broom handle or the people who</p> <p>16 approached the cage, and it was like a dog that weighed</p> <p>17 maybe ten pounds, a little Chihuahua mix, and she was</p> <p>18 bragging, and our job was to go and to assess pets for</p> <p>19 adoption, so if it has aggressive issues, we needed to</p> <p>20 know that, and again, I've worked in veterinary medicine a</p> <p>21 very long time; I've worked side by side with people whose</p> <p>22 PhD is in behavior, so I understand a lot about pet</p> <p>23 behavior, and some dogs just do, when they are afraid,</p> <p>24</p>
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<p>1 were just laying in feces.</p> <p>2 Q. And just so we have this accurate, you</p> <p>3 yourself have seen the animals at the shelter at the time</p> <p>4 that Sheriff Millirons was elected sheriff in which the</p> <p>5 animals were covered in feces, as you have just indicated?</p> <p>6 A. Once.</p> <p>7 Q. Once?</p> <p>8 A. Yes.</p> <p>9 Q. Okay, and you have heard about that</p> <p>10 condition occurring?</p> <p>11 A. Yes.</p> <p>12 Q. From other volunteers?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. And do you recall an incident in</p> <p>15 which it came to your attention that Ms. Perkins, now Ms.</p> <p>16 Jones, was using a broom stick inappropriately with an</p> <p>17 animal?</p> <p>18 A. Yes.</p> <p>19 MR. STRELKA: Okay. Let's mark this as the</p> <p>20 next Exhibit.</p> <p>21</p> <p>22 (The above-mentioned document was marked as</p> <p>23 Deposition Exhibit Number 47 and entered into the</p> <p>24 Deposition.)</p>	<p>1 they will guard their cage because that is their space,</p> <p>2 and they may attack someone who approaches the cage, but</p> <p>3 once you pull the dog out of its cage, the space that it's</p> <p>4 protecting, it -- the aggressive behavior may go away</p> <p>5 completely, and so the volunteers were trying to ask</p> <p>6 Chastity, can we pull this dog out and see if it still has</p> <p>7 the same behavior, and she refused to let them, and that</p> <p>8 is when she pulled out the broom and said, see how mean</p> <p>9 this thing is; as soon as my daddy comes in, he's putting</p> <p>10 this thing to sleep, we're not letting anybody adopt this</p> <p>11 dog or rescue this dog, it's too mean.</p> <p>12 Q. Okay. And while I'm on the subject of some</p> <p>13 identification here, the previous Exhibit regarding the --</p> <p>14 these individuals that came to the shelter, saw that the</p> <p>15 animals were covered in feces and noted that Ms. Perkins,</p> <p>16 now Ms. Jones, had allegedly brought two young boys to the</p> <p>17 shelter, who were those volunteers?</p> <p>18 A. For that particular day?</p> <p>19 Q. Yes, ma'am.</p> <p>20 A. I would have to go back through my records</p> <p>21 and check.</p> <p>22 Q. Okay.</p> <p>23 A. But it happened multiple times with</p> <p>24 multiple volunteers.</p>

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<p>1 Q. What happened multiple times with multiple</p> <p>2 volunteers?</p> <p>3 A. That we would have volunteers there, and</p> <p>4 Chastity would be there with her children or her son or</p> <p>5 her son and a friend. We weren't even sure. I mean,</p> <p>6 volunteers don't know who Chastity is. We don't know --</p> <p>7 they don't know who her son is, if she has children, who</p> <p>8 those people are, but they would just observe, they were</p> <p>9 young boys, and this is what they were doing.</p> <p>10 Q. For what it's worth, I will let you know</p> <p>11 that Ms. Jones testified that she didn't have any</p> <p>12 children, for what it's worth. This is a little out of</p> <p>13 the order, but I will introduce it now for identification</p> <p>14 purposes. Let's mark that as the next Exhibit.</p> <p>15</p> <p>16 (The above-mentioned document was marked as</p> <p>17 Deposition Exhibit Number 48 and entered into the</p> <p>18 Deposition.)</p> <p>19</p> <p>20 BY MR. STRELKA:</p> <p>21 Q. I just want to know if you recall sending</p> <p>22 this email.</p> <p>23 A. Yes.</p> <p>24 Q. Do you recall, do you see the middle</p>	<p>1 so some of these pictures may have been taken by you or</p> <p>2 other members of GCAR, and some of the pictures may have</p> <p>3 been taken by the investigator herself, okay?</p> <p>4 A. Okay.</p> <p>5 Q. And so I'm going to give you a big stack of</p> <p>6 these pictures, all right, and what I'm going to ask you</p> <p>7 is, see if you can identify what pictures you sent to the</p> <p>8 department, and what might help you.</p> <p>9 MR. GUYNN: There are a bunch of</p> <p>10 duplicates.</p> <p>11 MR. STRELKA: Well, blame the Department of</p> <p>12 Agriculture for sending me a bunch of duplicates.</p> <p>13 MR. GUYNN: Well, I don't know if that</p> <p>14 meant --</p> <p>15 MR. STRELKA: I will try to pull out the</p> <p>16 duplicates and just admit the others for the</p> <p>17 Exhibit.</p> <p>18 MR. GUYNN: I didn't know if that meant</p> <p>19 that these were extra copies of same Exhibit.</p> <p>20 MR. STRELKA: No, they gave me all of that,</p> <p>21 and I just hit "print" this morning.</p> <p>22 MR. GUYNN: Okay.</p> <p>23 BY MR. STRELKA:</p> <p>24 Q. So I would like you to take a look at these</p>
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<p>1 paragraph, it says, "I am an eye witness, that she," she</p> <p>2 being Chastity, "came in around 1:30 right as I was</p> <p>3 leaving. The volunteer who came in at 2:00 reported the</p> <p>4 shelter employee was not there when they arrived."</p> <p>5 A. Yes.</p> <p>6 Q. Did that occur; did situations like that</p> <p>7 occur more than once?</p> <p>8 A. Yes.</p> <p>9 MR. STRELKA: Okay. Jim, I'm going to hand</p> <p>10 to you -- I will have her -- we're not going to</p> <p>11 walk through each and every one of these pictures,</p> <p>12 but I just want to see if these are the ones that</p> <p>13 she sent to the department. I would like her to</p> <p>14 verify that what I'm giving you was actually a</p> <p>15 whole printout of a Freedom of Information Act</p> <p>16 request that we sent to the Department of</p> <p>17 Agriculture, and it actually includes a couple of</p> <p>18 extra documents, some of the emails that we shared</p> <p>19 in there. I haven't culled them out, but most of</p> <p>20 this is just pictures.</p> <p>21 MR. GUYNN: Okay.</p> <p>22 BY MR. STRELKA:</p> <p>23 Q. If we go to court, I will pay for some</p> <p>24 color ones, but all I have today are the black and whites,</p>	<p>1 pictures here.</p> <p>2 A. Okay.</p> <p>3 Q. And --</p> <p>4 MR. GUYNN: Are you going to label them?</p> <p>5 MR. STRELKA: And the ones that you -- what</p> <p>6 I'm going to do, the ones that she can identify as</p> <p>7 the ones that she submitted are the ones that I</p> <p>8 will make an Exhibit, so what I would like you to</p> <p>9 do is look through these pictures. It might help</p> <p>10 you to even refer to some of the other emails that</p> <p>11 identified some of the dogs, but I want you to see</p> <p>12 if you can tell me which of those pictures you</p> <p>13 sent.</p> <p>14 THE WITNESS: Okay.</p> <p>15 BY MR. STRELKA:</p> <p>16 Q. All right.</p> <p>17 A. I sent those.</p> <p>18 Q. I will take that.</p> <p>19 A. These.</p> <p>20 Q. Okay.</p> <p>21 A. These. These. These. These</p> <p>22 (indicating).</p> <p>23 Q. I believe that those might have been taken</p> <p>24 by the investigator?</p>

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<p>1 A. Yes, these are investigator photographs.</p> <p>2 Q. Okay.</p> <p>3 A. And these (indicating).</p> <p>4 Q. Okay. So why don't you give me the ones</p> <p>5 that you didn't send, okay, and let me see if I have any</p> <p>6 other photographs that we might be able to separate real</p> <p>7 quick, okay, and then we will make that an Exhibit. Did</p> <p>8 you take this?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. Why did you take that? Well, I will</p> <p>11 wait and ask until we make this an Exhibit. Let me see if</p> <p>12 there is anything else. Okay, that is all that I wanted.</p> <p>13 So what we will do, we will get a little paper clip, and</p> <p>14 mark those.</p> <p>15 A. I think that there is a picture missing.</p> <p>16 Q. There is a picture missing?</p> <p>17 A. This dog that is outlined in this report.</p> <p>18 That is not here.</p> <p>19 Q. Okay. What is the dog outlined in that</p> <p>20 report?</p> <p>21 A. That one (indicating).</p> <p>22 Q. That is the dog?</p> <p>23 A. Yes.</p> <p>24 Q. A sad looking Snoopy there?</p>	<p>1 and what is that top photograph?</p> <p>2 A. This is a photograph of an animal custody</p> <p>3 record, and in particular, a female dog that had a</p> <p>4 severely injured paw.</p> <p>5 Q. Okay.</p> <p>6 A. That came in.</p> <p>7 Q. Okay.</p> <p>8 A. In June of 2012.</p> <p>9 Q. And why did you take the picture, or why</p> <p>10 did -- did you take this picture physically, or did</p> <p>11 someone else take that picture?</p> <p>12 A. This is again an incidence where a</p> <p>13 volunteer saw something that she was concerned about, and</p> <p>14 I asked her to send me documentation, and she provided</p> <p>15 this documentation to me from the shelter. This is a</p> <p>16 photocopy of shelter records, this page.</p> <p>17 Q. Okay.</p> <p>18 A. And this is a photograph of the dog.</p> <p>19 Q. All right, and the next page on that</p> <p>20 exhibit seems to be a single picture; let's go back so I</p> <p>21 can describe that for the Record, and there is a single</p> <p>22 picture of a white dog on the second page?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. And let's see.</p>
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<p>1 A. Yes.</p> <p>2 Q. Okay. And you sent all of these pictures</p> <p>3 that you have here?</p> <p>4 A. Yes.</p> <p>5 Q. To the department?</p> <p>6 A. Yes.</p> <p>7 Q. Yes?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And I would like to have -- thank</p> <p>10 you for doing that. I would like to have these pictures</p> <p>11 collectively identified as the next Exhibit, and here is a</p> <p>12 paper clip.</p> <p>13</p> <p>14 (The above-mentioned photographs were</p> <p>15 marked as Deposition Exhibit Number 49 and entered</p> <p>16 into the Deposition.)</p> <p>17</p> <p>18 THE WITNESS: Are there other copies of</p> <p>19 these?</p> <p>20</p> <p>21 BY MR. STRELKA:</p> <p>22 Q. Let's wait. Now we'll talk about that.</p> <p>23 You've just been handed Exhibit Number 49. What is that</p> <p>24 top picture? Collectively it is a number of photographs,</p>	<p>1 A. Described as a Dalmatian mix.</p> <p>2 Q. Okay, and what was your question to me a</p> <p>3 minute ago? You asked me if I had more of these forms.</p> <p>4 A. Yes, because for several of these other</p> <p>5 dogs --</p> <p>6 Q. Hmm-hmm.</p> <p>7 A. -- I had one of these photocopies to go</p> <p>8 with it, to show the time frame and the shelter intake</p> <p>9 number.</p> <p>10 Q. Okay. This does not look like a</p> <p>11 photograph; this looked like a xeroxed copy, and that</p> <p>12 should be in your pack, Jim, is that what you referring to</p> <p>13 or is that something different, and let me reflect to you</p> <p>14 that we send a Freedom of Information Act request to the</p> <p>15 Department of Agriculture, kind of asking for the whole</p> <p>16 shebang, and this is what they gave me.</p> <p>17 A. This is prior -- this is like after.</p> <p>18 Q. Okay.</p> <p>19 A. Well, I only have what I just provided you.</p> <p>20 Q. Let me take this away, but you have</p> <p>21 identified the other pictures there as pictures that you</p> <p>22 did send to the Department of Agriculture?</p> <p>23 A. Yes.</p> <p>24 Q. And these were pictures taken either by you</p>

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<p>1 or by other members of your organization while you were 2 present at the time?</p> <p>3 A. Yes, sorry, there is still some missing. 4 Q. Okay. 5 A. Go ahead. 6 Q. Well, I will tell you what, I thought that 7 I had everything, but today, or this weekend, if you want 8 to go home and see if there is anything else -- 9 A. Okay. 10 Q. -- any pictures, I would be happy to take 11 them and you can email them to me. 12 A. Okay. 13 Q. All right. 14 MR. GUYNN: To be clear, you are going to 15 provide that to us as an Exhibit? 16 MR. STRELKA: Yes, that is the Exhibit 17 right here. I just wanted her to pick from there 18 and help me to identify, and now this is 49, and 19 we will make a copy of that and get it spread 20 around. 21 MR. GUYNN: All right. 22 MR. STRELKA: Why don't you put 49 back 23 over here with 48, thank you. I would like this 24 to be Number 50.</p>	<p>1 A. On average, an hour per day or less, if she 2 even came in. 3 Q. Okay. And you understand that she has 4 accused members of your organization and you yourself 5 about lying about all of this? 6 A. I haven't -- 7 Q. I will represent to you that she just 8 testified to that. 9 A. Okay. 10 Q. Did you ever have any conversations with 11 the investigator? 12 A. No. 13 Q. Are you aware of -- well, strike that. The 14 sheriff is no longer in control of the shelter; is that 15 right? 16 A. That is my understanding, yes. 17 Q. Okay. And are volunteers currently from 18 GCAR or G.A.R. now assisting with the shelter as they had 19 been prior to their limited access that was enacted in 20 2013? 21 A. Our volunteers have been informed that we 22 can contact the County administration office and go 23 through and complete paperwork and become volunteers at 24 the shelter again, as of 2014.</p>
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<p>1 2 (The above-mentioned document was marked as 3 Deposition Exhibit Number 50 and entered into the 4 Deposition.) 5 6 BY MR. STRELKA: 7 Q. Do you recall sending this email? 8 A. Yes. 9 Q. And why did you send this email? 10 A. Again, these are cases that we had seen 11 come into the shelter where proper care was not being 12 provided. 13 Q. Okay. 14 A. And this was documentation of what we 15 witnessed as a group of volunteers. 16 Q. Okay. 17 A. And some of these photographs are what I'm 18 describing in this email. 19 Q. Okay. And given your observations and the 20 reported observations of your members of your 21 organization, sitting here today, can you tell me how many 22 hours Ms. Perkins was working per week at the shelter? 23 You may not be able to tell me; you may have no clue, but 24 I was just asking.</p>	<p>1 Q. Okay. 2 A. Volunteers are quite aware of that. 3 Q. Okay. 4 A. However, none who have been previously 5 through this experience of false accusations care to go 6 and put themselves in that position again. 7 MR. STRELKA: Okay. I don't have any 8 further questions. Jim? 9 10 EXAMINATION BY JIM H. GUYNN, JR., ESQ. 11 Q. You mentioned earlier that you had 12 volunteered at other shelters, and I think you mentioned 13 Montgomery? 14 A. Yes. 15 Q. Why did you stop volunteering there? 16 A. Because I realized that Giles County had a 17 need, and I live in Giles, so why am I not helping Giles 18 County pets, and that is what I felt moved to do. 19 Q. And if I suggested to you that they don't 20 want you back at the Montgomery County shelter, what would 21 you say? 22 A. I would say that is not true. 23 Q. Okay. You -- and I'm trying to keep all of 24 it together, but you indicated that prior to sending</p>

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<p>1 emails to the Department of Agriculture, you had told the</p> <p>2 volunteers that they needed to document these things?</p> <p>3 A Yes.</p> <p>4 Q. Did I understand that correctly?</p> <p>5 A. Yes.</p> <p>6 Q. Now, what kind of documentation are you</p> <p>7 talking about?</p> <p>8 A. I asked them to write down exactly what</p> <p>9 they observed, the date that they said were there, what</p> <p>10 they observed, and any pictures that they had.</p> <p>11 Q. Okay. And so your -- okay, so the pictures</p> <p>12 would be to verify what they saw?</p> <p>13 A. Correct.</p> <p>14 Q. But the fact that they wrote something down</p> <p>15 does not verify what they saw, does it?</p> <p>16 A. I can't answer that.</p> <p>17 Q. Okay. Well, do you accept everything that</p> <p>18 is written as true?</p> <p>19 A. I have worked with the volunteers, and I</p> <p>20 trusted them and I did take their word for it, that they</p> <p>21 were telling the truth.</p> <p>22 Q. But you needed documentation?</p> <p>23 A. Yes, because I think that that is what is</p> <p>24 the most helpful, and you can always have -- anything that</p>	<p>1 Q. Okay.</p> <p>2 A. And I know the family, and I know their</p> <p>3 finances, and they are -- they already had a female that</p> <p>4 they were not getting spayed and neutered because they</p> <p>5 could not afford it, so I gave them a certificate to get</p> <p>6 the newly adopted dog and the female that they had for</p> <p>7 eight years spayed.</p> <p>8 Q. Had you had any contact with them prior to</p> <p>9 that instance about making certificates available to them?</p> <p>10 A. Never.</p> <p>11 Q. Okay. Do you know how it is that they came</p> <p>12 to contact you?</p> <p>13 A. It's known in the community that I do this</p> <p>14 work, and we advertise throughout the community to contact</p> <p>15 us if you need spay and neuter assistance, and they --</p> <p>16 friends of friends, they knew that I was president of the</p> <p>17 animal rescue, so that is why they sought me out to see --</p> <p>18 they had heard that animal rescue could help provide spay</p> <p>19 and neuter assistance, and knowing that I was president of</p> <p>20 the group, that is why they sought me and asked me that</p> <p>21 personally, if I would help them.</p> <p>22 Q. Okay.</p> <p>23 A. And then he said, where did you get the</p> <p>24 dog, and that is when the conversation started.</p>
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<p>1 you can have in writing, because I -- three years from now</p> <p>2 when you have to have a conversation about what happened</p> <p>3 three years ago, it helps if you have that documentation</p> <p>4 to help you remember, that the facts are kept straight.</p> <p>5 Q. And you indicated that -- let me make sure</p> <p>6 of my note. I think you said that many of your volunteers</p> <p>7 did not know who Chastity was?</p> <p>8 A. They recognized her face as she is the</p> <p>9 kennel helper hired by the County; they didn't actually</p> <p>10 know what her name was or who she was as a person, that is</p> <p>11 what I was referring to, or anything about her personally.</p> <p>12 Q. On the -- on the example that you gave, and</p> <p>13 I can't tell you what Exhibit it was, about not collecting</p> <p>14 the deposit?</p> <p>15 A. Yes.</p> <p>16 Q. The folks then called you and said, we</p> <p>17 don't have the money to get this dog spayed?</p> <p>18 A. Correct.</p> <p>19 Q. All right.</p> <p>20 A. Actually, it was in person, not a phone</p> <p>21 call.</p> <p>22 Q. Okay, so would you agree with me that they</p> <p>23 wouldn't have had \$150 to make a deposit, either?</p> <p>24 A. That is correct. They told me so.</p>	<p>1 Q. All right. If I understand correctly, dogs</p> <p>2 that are not adopted at shelters or not rescued are</p> <p>3 euthanized?</p> <p>4 A. Correct.</p> <p>5 Q. Isn't it better that this dog was adopted</p> <p>6 out, even though the family didn't have \$150, in a</p> <p>7 situation where they could get the dog spayed by the</p> <p>8 certificate than to be euthanized?</p> <p>9 A. I would disagree with that, and one of the</p> <p>10 reasons why our volunteers wholeheartedly uphold the Giles</p> <p>11 County regulation is because we understand that when they</p> <p>12 take this pet home, if they can't afford spay and neuter,</p> <p>13 it's going to reproduce, and then when -- there is already</p> <p>14 a pet overpopulation problem; we would rather see a pet</p> <p>15 humanely euthanized than to continue this overpopulation</p> <p>16 problem where dogs are just going to die because there is</p> <p>17 lack of food, lack of care, because of overpopulation.</p> <p>18 Q. Okay.</p> <p>19 A. I have personally assisted with euthanizing</p> <p>20 many dogs because there is no place for them. I feel very</p> <p>21 passionate about this.</p> <p>22 Q. Okay. I know nothing about it, so I'm</p> <p>23 not -- I'm not, you know, I'm just curious about the</p> <p>24 concept.</p>

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<p>1 A. Yes.</p> <p>2 Q. Now, you indicated that people had, in your</p> <p>3 group, had suggested that these adoptions without paying</p> <p>4 the deposit were done for friends of folks that worked at</p> <p>5 the dog shelter?</p> <p>6 A. No, not people that worked there; the</p> <p>7 staff, we felt, were letting certain animals be adopted by</p> <p>8 their friends and family without the -- the friends and</p> <p>9 family of the staff were being allowed to adopt without</p> <p>10 doing the spay and neuter deposit.</p> <p>11 Q. I'm confused. I thought that that is what</p> <p>12 I asked.</p> <p>13 A. Sorry, I must have misunderstood you.</p> <p>14 Q. I said employees, you said staff. Are we</p> <p>15 talking about the same thing?</p> <p>16 A. Yes, we are.</p> <p>17 Q. So who is the staff at the shelter?</p> <p>18 A. That would be animal control officers and</p> <p>19 Chastity at that time period.</p> <p>20 Q. Okay, and what is the basis for that rumor?</p> <p>21 A. Because when the volunteers would go and we</p> <p>22 would see that the dog had been adopted, we would go</p> <p>23 through the paperwork, because all of the paperwork is in</p> <p>24 a certain bin on the desk where we all have access to</p>	<p>1 these statements under Oath and you have no basis for it?</p> <p>2 A. I'm telling you what we observed.</p> <p>3 Q. But what you testified today was that you</p> <p>4 believe that friends of the staff were adopting without</p> <p>5 making a deposit, and you just told me that you had no</p> <p>6 basis for that whatsoever?</p> <p>7 A. This is the -- this is the volunteers over</p> <p>8 many years who would come to us, who would come to -- it</p> <p>9 was a common belief with the volunteers that this was a</p> <p>10 common practice, but we could not prove it, and that is</p> <p>11 what I stated.</p> <p>12 Q. Now, you were -- if I am reading this</p> <p>13 correctly, and help me if I'm not, take a look at Exhibit</p> <p>14 Number 44. Do you recall testifying about these emails?</p> <p>15 A. Yes.</p> <p>16 Q. And I'm trying to make sure that I</p> <p>17 understand. As of these emails, when the decision -- or</p> <p>18 had the Giles Animal Rescue been advised that they were no</p> <p>19 longer going to be allowed to volunteer at the shelter?</p> <p>20 A. I'm trying to remember, because I don't see</p> <p>21 the second page; I'm sorry, ask the question again,</p> <p>22 please.</p> <p>23 Q. I'm trying to figure out if these are the</p> <p>24 emails that indicate that this is about the time that the</p>
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<p>1 paperwork, and one reason why there is access to the</p> <p>2 paperwork is because in case and owner would call and ask,</p> <p>3 I lost a dog, we can flip through records and say, oh,</p> <p>4 yes, I do see it came in three weeks ago, but that is what</p> <p>5 has happened and we have those records. We have them</p> <p>6 available to us for 30 days from the time of intake.</p> <p>7 Q. Okay.</p> <p>8 A. And so volunteers were noticing, especially</p> <p>9 certain purebred dogs that were highly more in demand, I</p> <p>10 suppose is the right word, we would see that they were</p> <p>11 being adopted and -- but we didn't see any receipt for the</p> <p>12 spay and neuter deposit.</p> <p>13 Q. Okay.</p> <p>14 A. You could see that there was adoption</p> <p>15 paperwork but not necessarily always a receipt for the</p> <p>16 deposit.</p> <p>17 Q. And how does that get to them being friends</p> <p>18 of the staff?</p> <p>19 A. Again, this is our belief of what was</p> <p>20 happening. I don't have proof for it.</p> <p>21 Q. You don't have any basis for it, that they</p> <p>22 are friends of staff, do you?</p> <p>23 A. Of course not.</p> <p>24 Q. Isn't that a tad irresponsible to be making</p>	<p>1 Giles Animal Rescue volunteers were no longer being</p> <p>2 allowed to volunteer at the shelter.</p> <p>3 A. Okay, yes.</p> <p>4 Q. Okay. And from that time until 2014 when</p> <p>5 the County assumed the operational responsibility for the</p> <p>6 shelter, were Giles Animal Rescue volunteers ever allowed</p> <p>7 back in to volunteer?</p> <p>8 A. There was a short period of time where we</p> <p>9 did work out, and this was because the volunteers</p> <p>10 requested it, we asked that staff be present before we</p> <p>11 send volunteers, and that way, there would be this</p> <p>12 accountability that the -- for when the volunteers were</p> <p>13 there, that we felt that there would be no more false</p> <p>14 accusations if staff would be there while we were there</p> <p>15 volunteering.</p> <p>16 Q. Can you give me the dates of that?</p> <p>17 A. Not without going back through emails to</p> <p>18 make a time line for you.</p> <p>19 Q. Okay. Now, when you talked about going --</p> <p>20 you had to go and retrieve food and other items that</p> <p>21 animal rescue, Giles Animal Rescue, had left at the</p> <p>22 shelter?</p> <p>23 A. Yes.</p> <p>24 Q. That was pretty soon after you were told</p>

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<p>1 that you were no longer going to volunteer, right?</p> <p>2 A. Well, if you look at this documentation, I</p> <p>3 believe, was it in May that we decided to pull back and</p> <p>4 not send volunteers, even though staff would be there.</p> <p>5 Q. Okay.</p> <p>6 A. And then we were told to come and get our</p> <p>7 things, not until September.</p> <p>8 Q. Okay.</p> <p>9 A. It was actually on September 11th, when I</p> <p>10 went there.</p> <p>11 Q. Okay. When you say that you remember the</p> <p>12 date, because of September 11th?</p> <p>13 A. Yes.</p> <p>14 Q. The significance of September 11th?</p> <p>15 A. Yes.</p> <p>16 Q. And the Twin Towers?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. All right, you were asked about who</p> <p>19 from the County told you to contact the Sheriff, and you</p> <p>20 indicated that the previous president of G.A.R. had told</p> <p>21 you that?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. And did you make any attempt other</p> <p>24 than what is shown in the emails to talk with anybody at</p>	<p>1 Q. And have you had any individual contact</p> <p>2 with Mr. Dunn to discuss these issues?</p> <p>3 A. No.</p> <p>4 Q. Okay, do you know of anybody from your</p> <p>5 group that has had individual contact with Mr. Dunn?</p> <p>6 A. No, not that I am aware of.</p> <p>7 Q. Okay. In the course of your discussions --</p> <p>8 well, let me scratch that. Let me go back and put in a</p> <p>9 foundation. You had at least one meeting with Sheriff</p> <p>10 Millirons, didn't you?</p> <p>11 A. Yes.</p> <p>12 Q. And was there more than one meeting?</p> <p>13 A. Yes.</p> <p>14 Q. How many were there?</p> <p>15 A. There were a couple of meetings where it</p> <p>16 was just me in his office; that has been several years</p> <p>17 ago.</p> <p>18 Q. Okay.</p> <p>19 A. And then our vice president also met with</p> <p>20 him just one on one a couple of times.</p> <p>21 Q. Okay, I'm just asking about your meetings</p> <p>22 with him.</p> <p>23 A. All right, and then a few times our group,</p> <p>24 myself and the vice president, and on one occasion April</p>
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<p>1 the County about the animal shelter?</p> <p>2 A. I had been to the Board of Supervisors'</p> <p>3 meetings and shared information with various volunteers</p> <p>4 had tried to speak with the Board of Supervisors members</p> <p>5 one on one throughout the years also.</p> <p>6 Q. When you say "had tried to," did they</p> <p>7 succeed?</p> <p>8 A. Yes.</p> <p>9 Q. And did you have any contact with</p> <p>10 individual Board of Supervisors members?</p> <p>11 A. Just at meetings.</p> <p>12 Q. Okay.</p> <p>13 A. When I would go to meetings and discuss</p> <p>14 things.</p> <p>15 Q. You spoke with them in the meeting as a</p> <p>16 group?</p> <p>17 A. It was at the public meetings that they</p> <p>18 have.</p> <p>19 Q. They have the opportunity for public</p> <p>20 comment?</p> <p>21 A. Yes.</p> <p>22 Q. And you signed up and made comments to the</p> <p>23 entire Board?</p> <p>24 A. Yes.</p>	<p>1 Lowry, our coordinator, also was at a meeting, so we</p> <p>2 had -- we've had several meetings over the last three</p> <p>3 years.</p> <p>4 Q. Okay, so when you said "several years," you</p> <p>5 meant the last three years?</p> <p>6 A. Yes.</p> <p>7 Q. Was there any older than that?</p> <p>8 A. Other volunteers before me had also met</p> <p>9 with the Sheriff.</p> <p>10 Q. Okay.</p> <p>11 A. Concerning the staff and the things that</p> <p>12 weren't being done, or were being done inappropriately,</p> <p>13 yes.</p> <p>14 Q. And if I recall your testimony, the</p> <p>15 organization was formed in 1999 because of that concern</p> <p>16 that things weren't being done correctly at the pound -- I</p> <p>17 mean the shelter, I'm sorry.</p> <p>18 A. Yes, yes, and at that time because of our</p> <p>19 concerns, the community got together and we built a newer</p> <p>20 and better shelter.</p> <p>21 Q. Is that the one being used now?</p> <p>22 A. That is the one we use now, yes.</p> <p>23 Q. And over the years, since the completion of</p> <p>24 that shelter, when was it completed, I'm sorry?</p>

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1	A. I would have to go back through the	1	MR. GUYNN: -- that the court reporter is
2	records.	2	going to prepare, and after she prepares it, she
3	Q. Approximately. Was it mid 2000's?	3	can send it to you along with a signature page and
4	A. Well, 2003, I can't remember.	4	errata sheet and you read it, and within 30 days,
5	Q. Okay.	5	you will have to return it, and you can fill out
6	A. To be honest, I would have to look it up.	6	the errata sheet and change things that you want
7	Q. Is it fair to say that it was well before	7	to change if you need to, or you can authorize the
8	Sheriff Millirons became Sheriff?	8	court reporter as a notary public to just sign
9	A. Honestly, I don't know how long he's been	9	your name to it, and if you want a copy of your
10	Sheriff.	10	deposition testimony, one of us will get it for
11	Q. I will tell you he started in 2008?	11	you.
12	A. Okay, likely prior to that.	12	THE WITNESS: Okay.
13	Q. Did you ever meet with Sheriff Altizer?	13	MR. GUYNN: But you will save yourself a
14	A. No.	14	lot of time and you don't have to sign it, is the
15	Q. Do you know if anybody from your group did?	15	bottom line, so it's really up to you.
16	A. I do not.	16	MR. STRELKA: In my experience, most people
17	Q. Okay. Other than your comments to the	17	just waive.
18	Board of Supervisors in public comment, did you have	18	THE WITNESS: Okay.
19	meetings with -- I will say non-elected officials in the	19	MR. STRELKA: Are you fine waiving?
20	County, staff, Chris McKlarney, Kevin Belcher, someone	20	MR. GUYNN: I will send you a copy of the
21	like that?	21	transcript so you can have it and read it.
22	A. Our volunteers did go to the manager of the	22	THE WITNESS: I just want to make sure that
23	Greenbrier who was the person that actually -- that	23	I understand. Do I need to do anything else?
24	Chastity actually did work for, who was the controller.	24	MR. STRELKA: No.
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1	Q. Okay.	1	MR. GUYNN: Not if you waive.
2	A. They had -- our volunteers had gone to Mr.	2	THE WITNESS: So you are saying that I can
3	Duncan and said, you know, you have an employee, we have	3	choose now to state that I want to waive?
4	these concerns that they are not doing their job, they are	4	MR. STRELKA: Yes, ma'am.
5	getting paid for work they are not doing.	5	THE WITNESS: Yes.
6	Q. Okay. And when you met with the Sheriff in	6	MR. STRELKA: Will you do that?
7	his office, was anybody else there in the office, just you	7	THE WITNESS: Yes.
8	and him?	8	MR. STRELKA: You are free to go.
9	A. On two occasions, not -- it was just the	9	
10	two of us.	10	(The deposition concluded at 12:45 p.m.)
11	Q. Okay.	11	
12	A. There was one occasion when Chris McKlarney	12	
13	was present, and Charlie Herbert.	13	
14	Q. All right. I'm sorry, Charlie Herbert?	14	
15	I'm just repeating that for the court reporter.	15	
16	A. Yes.	16	
17	MR. GUYNN: I don't have any other	17	
18	questions.	18	
19	MR. STRELKA: Neither do I. Thank you,	19	
20	ma'am.	20	
21	MR. GUYNN: I guess since I have the speech	21	
22	down, we have to get your signature on the	22	
23	transcripts of your testimony --	23	
24	THE WITNESS: Okay.	24	

<div>1 WITNESS SIGNATURE WAIVER</div> <div>2</div> <div>3 The signing of the deposition by the</div> <div>4 deponent was waived at the time of the taking of</div> <div>5 the deposition.</div> <div>6</div> <div>7 <i>Lisa M. Hooker RPR</i></div> <div>8</div> <div>9 LISA M. HOOKER, RPR #29505</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div>	<div>Page 82</div>
<div>1 C E R T I F I C A T E</div> <div>2 COMMONWEALTH OF VIRGINIA</div> <div>3 COUNTY OF ROANOKE</div> <div>4 I, Lisa M. Hooker, Notary Public in and for</div> <div>5 the Commonwealth of Virginia, at Large, do hereby certify</div> <div>6 that the Deposition of CHRISTINE LINK-OWENS was by me</div> <div>7 reduced to machine shorthand in the presence of the</div> <div>8 witness, afterwards transcribed under my direction by</div> <div>9 means of Computer, and that to the best of my ability the</div> <div>10 foregoing is a true and correct transcript of the</div> <div>11 Deposition as aforesaid.</div> <div>12 I further certify that this Deposition was</div> <div>13 taken at the time and place in the foregoing caption</div> <div>14 specified.</div> <div>15 I further certify that I am not a relative,</div> <div>16 counsel or attorney for either party or otherwise</div> <div>17 interested in the outcome of this action.</div> <div>18 IN WITNESS WHEREOF, I have hereunto set my</div> <div>19 hand at Roanoke, Virginia, on this the 24th day of</div> <div>20 April, 2015.</div> <div>21 <i>Lisa M. Hooker RPR</i></div> <div>22 Lisa M. Hooker</div> <div>23 Notary Public</div> <div>24 My commission expires October 31, 2015.</div> <div>Notary Registration Number: 165043</div>	<div>Page 83</div>

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